

Message

From: Wayne Miller [Miller.Wayne@azdeq.gov]
Sent: 6/22/2016 8:39:06 PM
To: d'Almeida, Carolyn K. [dAlmeida.Carolyn@epa.gov]
CC: Davis, Eva [Davis.Eva@epa.gov]
Subject: 2016-6-22 - wafb - Napl disappearance -

ADEQ silent without legal and manager participation.... But Praxis and UXO Pro proffering comments:

For your use -

In the discussion of NAPL appearance and disappearance, the hydraulics have changed and NAPL is not expected to reappear in extraction wells as described in EPA/ADEQ's letter. Without the drawdown experienced during SEE, the NAPL will not collect in the SEE wells as readily and just because it does not accumulate in the well, it does not mean it does not exist in the vicinity of the well. Further, three SEE injection wells have NAPL detected.

EBR will have a small impact on dissolution rates. Why not just do P&T?

The implications are that 20 year time frame is highly unlikely.

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